

61.315(c)(11) is an excellent part of Sport Pilot. It restricts Sport Pilots from needing the additional training for hypoxia awareness, and for airspace awareness and separation above 10,000. Since these are questions that cannot then be asked on the practical test, this reduces the required training time and makes this part of the Sport-Pilot practical test wholly different from the Private Pilot Practical Test.

On the other hand, flight above 10,000 feet should be allowed both for Sport and Recreational pilots as a CFI endorsement. Under the current rule, a CFI can solo a pilot in that exact same aircraft, with the exact same weight in the passenger seat (just cargo instead of a person), under Private pilot solo rules, and have them fly at altitudes above 10,000 feet MSL. This has been true for many decades, and is critical training and very useful for those FBOs that solo students at high airports (Denver or Reno, for example.)

It makes excellent sense to have this be an endorsement option for the CFI, since it simply recognises something a CFI is already able to do. It's difficult for me to envision why having a passenger or being solo influences whether a CFI should be able to have this as an available endorsement.

It may also be worthwhile to allow lower visibility requirements and allow flight at night for Sport Pilots with CFI endorsement and the respective training corresponding to this outlined in the Private Pilot training requirements. However, this requires a bit more scrutiny, since visibility and night flight contribute significantly to fatalities, whereas flight above 10,000 feet is not a cause of significant part 61/91 accidents of which I am aware.

But it is worth considering the option for night and lowered vis endorsements if the training is done, and the pilot has more experience than the required 20 hours. Perhaps make the endorsement option available at 40 hours.

It seems quite logical to have many of the restrictions on Sport Pilot removable with appropriate training, a certain amount of required experience, and an appropriate endorsement. Then when the pilot wants more than one passenger or a faster and more complicated plane it is natural for him to complete the PPL at the next level.